



# Community Eligibility Provision Implementation in Tennessee

April 2014

# **Agenda**

- **Overview: Community Eligibility Provision (CEP)**
- **TN Process for Enrolling and Implementing CEP**
- **District Funding Allocations in Tennessee**
- **Things to Remember**
- **Additional Resources**

# **Overview: Community Eligibility Provision (CEP)**



# Community Eligibility Provision (CEP)

- A universal meal plan under the National School Lunch Program (NSLP) that permits eligible LEAs and schools to provide meal service to all students at no charge, regardless of economic status.

*(Section 104a of the Healthy, Hunger-Free Kids Act)*

# Benefits of CEP

In a joint letter, Secretary of Education Arne Duncan and Secretary of Agriculture Thomas J. Vilsack stated the benefits as:

- Reduces USDA required administrative costs and paperwork
- More children may receive nutritious meals during the school day
- Creative meal service models are easier to implement
- Eliminates tracking and accounting student meal charges

# Challenges of CEP

- Information from USDA school nutrition forms is currently used in formulas to determine district allocations for:
  - Title I funding
  - IDEA funding
  - eRate funding
  - BEP funding
- This information is also used in our accountability systems to determine percentages for the subgroup Economically Disadvantaged (ED)

# Participant Responsibilities

- Serve free meals to all students in participating schools
- Count the number of reimbursable meals served to students daily
- Cover costs of providing free meals to all students that exceed the Federal reimbursement with only non-Federal funds
- Comply with all CEP procedures as described in [Proposed Rules: National School Lunch Program and School Breakfast Program](#)

# CEP Eligibility Requirements

An LEA, school, or schools must have a directly certified identified student percentage  $\geq 40\%$  by April 1, prior to the first year of implementation

- Identified student percentage may be determined by:
  - Individual participating school
  - Group of participating schools (within an LEA)\*
  - Entire LEA\*

$$* \text{ **Identified Student Percentage** } = \frac{\text{Number of Identified Students}}{\text{Number of Enrolled Students}} \times 100$$

*\*Divide total number of identified students in individual or grouped schools by total enrollment for all individual or grouped schools to determine eligibility.  
Individual schools within a group or LEA do not have to meet the 40% threshold*



# Identified Students

- Low Income children that are Direct Certified
  - Supplemental Nutrition Assistance Program (SNAP)
  - Temporary Assistance to Needy Families (TANF)
  - Homeless, migrant, runaway
  - Certified foster children
- Students certified through the following programs
  - Children enrolled in Head Start Program or Even Start programs

***Direct certified is not the same as FRPL eligible***

# Enrolled Students

- Students who are enrolled in CEP participating schools, attend at least a portion of the day, and have access to at least one meal service daily qualify.
  - Includes half-day students who have access to either breakfast or lunch

$$\text{Identified Student Percentage} = \frac{\text{Number of Identified Students}}{\text{Number of Enrolled Students}} \times 100$$

# CEP Claiming Percentages

- CEP Claiming Percentage = Identified Student Percentage x 1.6  
(cannot exceed 100%)
- CEP Claiming Percentage reimbursed at the Federal free rate (\$3.01)
- Remaining meals are reimbursed at the Federal paid rate (\$0.36)
- Meal costs in excess of the total Federal reimbursement must be covered through non-Federal sources

# Other School Nutrition Programs

The CEP free claiming percentage may be used when determining school or site eligibility for other School Nutrition Programs such as:

- Fresh Fruit and Vegetable Program
- Afterschool Snacks
- Seamless Summer Option

# **TN Process for Enrolling and Implementing CEP**



# Process and Requirements for LEAs

LEAs intending to elect CEP for some or all schools must:

- Demonstrate school or schools meets eligibility by **April 1** by using the school nutrition March claiming numbers
- Notify the Office of School Nutrition of intent to enroll and submit documentation by **June 30**
- Maintain at the school or LEA level all required documentation of CEP eligibility for review and monitoring purposes

# Applying for CEP

- The list of eligible and nearly eligible schools is posted on the [department site](#)
  - Will post annually by April 15
  - Has both LEA wide data and school notification data
- Will enroll using the regular application packet via the Tennessee: Meals, Accounting and Claiming (TMAC)
  - There is a question on the application asking whether the SFA will operate CEP. If the response is no, regular operation is used.
- Revised application packet will be available May 1, 2014

# Community Eligibility List



## Community Eligibility Provision (CEP) Annual Notification of Schools

State agency: Tennessee

State agencies must publish a list of schools receiving CEP eligibility notices. Please enter the school name, LEA name, LEA ID, identified student percentage (or proxy) and an "X" in the appropriate column (6-8). There should only be one "X" per school.

1	2	3	4	5	6	7	8
School Name	LEA name	LEA ID	Identified Student Percentage (ISP)	Proxy Identified Student Percentage (ISP)	Eligible to Participate	Near Eligible to Participate	Participating and Eligible for a Grace Year
<i>Name of school receiving a CEP eligibility status notification</i>	<i>Name of LEA for the school in column 1</i>	<i>LEA ID for the LEA entered in column 2</i>	<i>Identified student percentage</i>	<i>If applicable, enter the proxy percentage below for each school in column 1 Proxy percent = number of directly certified students with SNAP/enrollment</i>	<i>Place an "X" in this column if the school in column 1 is eligible to participate in CEP (ISP) &gt;= 40%</i>	<i>Place an "X" in this column if the school in column 1 is nearly eligible to participate in CEP (ISP) &gt;= 30%</i>	<i>Place an "X" in this column in the school in column 1 is currently in the 4th year of the participation and is eligible for a grace year (ISP) &gt;= 30%</i>
Andersonville Elementary	Anderson County	10	39.403			X	
Briceville Elementary	Anderson County	10	57.265		X		



# CEP Renewal Requirements

- Once enrolled in the program, the cycle is 4 years
  - There is no need to recalculate eligibility
- To begin a new cycle, LEAs or schools establish a most current identified student percentage by April 1 of the fourth year
- To cease community eligibility for the following year, notify the Office of School Nutrition by June 30

# Process for Making Changes

- **Discontinuing CEP:** Complete the FRPL application in TMAC during the annual enrollment process by June 30
  - Process is the same whether within or at the end of the 4-year cycle
  
- **Updating your CEP Claiming Percent:** Will notify the department through the annual enrollment process
  - Will have to update your direct certification percent annually even if you do not want to update your CEP Claiming Percent

# **District Funding Allocations in Tennessee**



# Collecting socioeconomic data

In TN, information gathered from Free and Reduced Priced Lunch (FRPL) data is used for Title I, IDEA, BEP and eRate funding. In order to maintain the current level of funding in our LEAs, both CEP and non-CEP schools will be required to collect data.

- Non-CEP schools will continue to collect information using the FRPL form

## Some changes to current practice

- CEP schools will **collect information on a simplified state form**  
(School nutrition staff may be utilized if partially locally funded)
- **Uploading collected data through EIS** will be required for both CEP and Non-CEP schools

# Tennessee Household Survey for CEP Schools

- The department will provide the State form, sample letter for parents and other documents in a district toolkit on the department website
- Form will get collected at school or district level (to be determined by the district)
  - Form template and sample letter should be modified to reflect this decision
  - Forms are subject to normal record retention requirements
- Staff paid 100% from school nutrition funds cannot collect and process these forms



## Household Information Survey

**District and/or School**

(Please provide only one survey per household)

### ADDRESS

Parent Name: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

### STUDENT NAME(S)

### ATTENDING SCHOOL(S)

Do not fill out this section. For School Use Only:

Student ID: \_\_\_\_\_ ☐ Y ☐ N

Student ID: \_\_\_\_\_ ☐ Y ☐ N

Student ID: \_\_\_\_\_ ☐ Y ☐ N

Student ID: \_\_\_\_\_ ☐ Y ☐ N

Student ID: \_\_\_\_\_ ☐ Y ☐ N

Student ID: \_\_\_\_\_ ☐ Y ☐ N

Please check **TWO** boxes below:

- 1) Column 1 that indicates the number of people in your household; and
- 2) Column 2 that represents your annual income.
- 3) Both check marks must be in the same row.

Household Size	Annual Gross Income:		
<input type="checkbox"/> 1	<input type="checkbox"/> Between \$0 - \$21,590	OR	<input type="checkbox"/> Above \$21,590
<input type="checkbox"/> 2	<input type="checkbox"/> Between \$0 - \$29,101	OR	<input type="checkbox"/> Above \$29,101
<input type="checkbox"/> 3	<input type="checkbox"/> Between \$0 - \$36,612	OR	<input type="checkbox"/> Above \$36,612

# Student Demographic Data





- Need to collect data from the State form and direct certified lists
  - Non-CEP schools will continue loading FRPL data in their Student Information Systems (SIS)
- Will collect most direct certified data directly from DHS and DCS
- Other applicable categorical data will be collected at the local level (e.g. Migrant, Even Start, etc.)
- Information collected from the State form must also get entered into the SIS
  - State form has a Y/N category in which you will indicate if a student meets the socioeconomic requirements

# District Allocations & Economically Disadvantaged in Tennessee

- **District Allocations Guidance:** Use the FRPL data from the 2013-14 SY to make district allocations for the 2014-15 SY
- We will provide guidance later on how we will determine district allocations for future school years
- **Economically Disadvantaged:** Currently there is no change to how we define economically disadvantaged in Tennessee
- We are continuing to have conversations around this topic and will advise once a decision has been made



# CEP and Data Source for Title I Funding

- US Ed     State Title I Allocation: Census
- TDOE     District: Census
- District     School: 2014-2015 FRPL data
- District     School: 2015-16 To be determined

# Things to Remember



## Remember...

- CEP provides a means to feed all kids for free, especially for LEAs/schools in high poverty areas
- You can enroll a school, groups of schools or an entire district
- Each school is responsible for covering the difference between federally reimbursed meals and total meals served
- You can discontinue participation in CEP at the end of any school year
- Offering the CEP option to LEAs is a federal requirement
- Participation by schools and districts is optional

## Also Remember...

- Parents/Guardians in CEP schools will complete the state form
- Parents/Guardians in non-CEP schools will continue to be directly certified or required to complete an application
- CEP schools will have to collect the state income form for funding
- CEP enrollment and changes will be processed in TMAC during the regular, annual enrollment process
- 2013-14 SY FRPL data will be used for 2014-15 SY district allocations
- This is our guidance on how we will address CEP **in Tennessee**

## Next Steps

Key Dates	Action	Responsible
May 1	Post district toolkit on website	TDOE
May 30	Submit LEA claiming reimbursement	LEA
June 30	Declare intent to use CEP for upcoming school year and submit required paperwork	LEA

# CEP Presentation Date at Regional Meetings

Dates	Event	Location
April 10	e-Plan Workshops (West)	Dyersburg
April 15	e-Plan Workshops (Middle)	Nashville
April 17-18	Spring Attendance Conference	Mufreesboro
April 23-24	School Nutrition Road Show (West)	Jackson
April 28-29	School Nutrition Road Show (Middle)	Nashville
May 1	Fiscal Workshop (Middle)	Fall Creek Falls SP
May 1-2	School Nutrition Road Show (East)	Knoxville
May 6	Fiscal Workshop (East)	Pigeon Forge
May 13	Fiscal Workshop (West)	Jackson

## **Additional Resources**

The Healthy, Hunger-Free Kids Act of 2010

[www.gpo.gov/fdsys/pkg/PLAW-111publ296/pdf/PLAW-111publ296.pdf](http://www.gpo.gov/fdsys/pkg/PLAW-111publ296/pdf/PLAW-111publ296.pdf)

USDA – Community Eligibility Provision

<http://www.fns.usda.gov/school-meals/community-eligibility-provision>

CEP Monthly Federal Reimbursement Calculator

<http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013a2.xls>

# Contact Information

For questions specific to School Nutrition

- [Sarah.C.White@tn.gov](mailto:Sarah.C.White@tn.gov)
- [Chris.Crutcher@tn.gov](mailto:Chris.Crutcher@tn.gov)

For all other questions

- [Rasheeda.Washington@tn.gov](mailto:Rasheeda.Washington@tn.gov)





[TN.GOV/Education](http://TN.GOV/Education)

[FACEBOOK.COM/TennesseeEducation](https://FACEBOOK.COM/TennesseeEducation)

[TWITTER: @TNedu](https://TWITTER.COM/TNedu)

# Back-up



# CEP Claiming Percentages Example

Identified student percentage = 50%

Free claiming percentage = 80% ( $50\% \times 1.6$ )

Paid claiming percentage = 20% ( $100\% - 80\%$ )

Total Daily Meals = 1,000

Number of Free meals = 800 ( $1,000 \times 80\%$ )

Number of Paid meals = 200 ( $1,000 - 800$ )

# Updating CEP Claiming Percentages

## Year 1

Identified student % = 50%

Free claiming percentage = 80% ( $50\% \times 1.6$ )

Paid claiming percentage = 20% ( $100\% - 80\%$ )

Total Daily Meals = 1,000

Number of free meals = 800 ( $1,000 \times 80\%$ )

Number of paid meals = 200 ( $1,000 - 800$ )

## Year 2

Identified student % = 53%

Free claiming percentage = 84.8% ( $53\% \times 1.6$ )

Paid claiming percentage = 15.2% ( $100\% - 84.8\%$ )

Total Daily Meals = 1,000

Number of free meals = 848 ( $1,000 \times 84.8\%$ )

Number of paid meals = 152 ( $1,000 - 848$ )

Additional 960 meals per month